UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OKLAHOMA

JOSHUA D. LAMB, et al.,	
Plaintiff,))
v.) Case No.: 4:22-cv-00055-TCK-SH
CITY OF TULSA, OKLAHOMA, et al.,)
Defendants.)

JOINT MOTION TO ENTER STIPULATED JUDGMENT UPON AGREED <u>SETTLEMENT</u>

Plaintiffs and Defendants (collectively, the "Parties"), respectfully request this Court enter the proposed Stipulated Judgment Upon Agreed Settlement submitted separately by the Parties.

The Parties have reached a settlement of this lawsuit. In order for Defendant City of Tulsa to be able to pay settlement proceeds from the City of Tulsa's pooled cash and investment portfolio and comply with Okla. Stat. tit. 62 § 362, the City must first have a judgment signed by the Parties and approved by the Court.

The Parties have agreed on the language of a proposed Stipulated Judgment Upon Agreed Settlement which has been separately submitted for this Court's review. Further, as the Court held in *Lawson v. Procares CRS, Inc.* Case No. 18-Cv-00248-TCK-JFJ, the Court need not approve the Parties settlement of the claims under the Fair Labor Standards Act. However, should the Court request, that Parties shall file a Motion to Approve Settlement.

WHEREFORE, the Parties respectfully request this Court approve and enter the proposed Stipulated Judgment Upon Agreed Settlement separately submitted.

/s/ Philip R. Bruce

Philip R. Bruce, OBA #20504 McAfee & Taft A Professional Corporation Eighth Floor, Two Leadership Square 211 North Robinson Avenue Oklahoma City, OK 73102-7103 Telephone: (405) 235-9621 Facsimile: (405) 235-0439 philip.bruce@mcafeetaft.com

-and-

R. Lawson Vaughn, OBA #21557 Senior Assistant City Attorney Kristina L. Gray, OBA #21685 Litigation Division Manager 175 E. Second Street, Suite 685 Tulsa, Oklahoma 74103 Telephone: (918) 596-7717 Facsimile: (918) 596-9700

ATTORNEYS FOR DEFENDANTS

s/Sara L. Faulman

Sara L. Faulman (admitted pro hac vice)
John W. Stewart (admitted pro hac vice)
McGillivary Steele Elkin LLP
1101 Vermont Avenue, N.W., Ste. 1000
Washington, DC 20005
Telephone: (202) 833-8855
slf@mselaborlaw.com
jws@mselaborlaw.com

-and-

James P. Hunt, OBA #15559 601 S. Boulder, Ste. 600 Tulsa, Oklahoma 73119 Telephone: (918) 497-9159 jamesphunt@earthlink.net

ATTORNEYS FOR PLAINTIFFS